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Attorneys For: Defendant  
Surety Bail Specialists General Agency,  
LLC f/k/a Lightning Bail Bonds, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JOVAN P. BLANTON,

Plaintiff,

vs.

SURETY BAIL SPECIALISTS GENERAL  
AGENCY, LLC., F/K/A LIGHTNING BAIL  
BONDS, LLC; and DOES I through X, inclusive,

Defendants.

CASE NO. 2:14-cv-01891-JAD-GWF

**DEFENDANT’S MOTION FOR  
EXTENSION OF TIME TO FILE A  
RESPONSIVE PLEADING**

(First Request)

Pursuant to Local Rule 6-2, Defendant Surety Bail Specialists General Agency, LLC (“Defendant”), by and through its counsel undersigned, requests that Defendant be given until April 30, 2015 to file its responsive pleading in this matter. Undersigned counsel was retained to defend Defendant on Friday, March 27, 2015. After conferring with Defendant, it became clear that Plaintiff’s claims are against another entity and Defendant has been improperly named. Undersigned counsel attempted to confer immediately with Plaintiff’s attorney, Kristina Holman, to advise her that Defendant was improperly named and to request that Plaintiff substitute the correct defendant and voluntarily dismiss Defendant. Unfortunately, Ms. Holman was unavailable.

Ms. Holman contacted undersigned counsel today (Tuesday, March 31, 2015) and agreed to consider Defendant’s request for voluntary dismissal. Because Defendant’s

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1 responsive pleading is due today, undersigned counsel requested and Ms. Holman agreed  
2 that she would stipulate to an extension of the pending deadline so that Ms. Holman  
3 could review the information provided by Defendant and consider its request for  
4 voluntary dismissal. Ms. Holman reported that she would be unable to prepare a  
5 stipulation given her schedule and her travel plans. For this reason, undersigned counsel  
6 agreed to prepare a joint stipulation for an extension of the deadline for Ms. Holman's  
7 review and approval. After preparing the stipulation, undersigned counsel sent it to Ms.  
8 Holman by email for her review and consideration and also called Ms. Holman seeking  
9 her approval to file the stipulation. As of the time this motion was filed, Ms. Holman had  
10 not responded to undersigned counsel's email or voicemail messages regarding the  
11 stipulation. Although Plaintiff has not approved the language of a stipulation, it is our  
12 understanding that Plaintiff will not oppose this request for extension of the deadline to  
13 file its responsive pleading.

14 The requested extension is necessary to allow the parties to confer, to ensure that  
15 the proper defendant is named, and to prevent Defendant from incurring unnecessary  
16 legal fees prior to Plaintiff filing a voluntary dismissal. The extension also will promote  
17 judicial efficiency and economy. For these reasons, Defendant respectfully requests that  
18 the Court extend the deadline for filing a responsive pleading to April 30, 2015.

19  
20 RESPECTFULLY SUBMITTED this 31<sup>st</sup> day of March, 2015.

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22  
23 By: /s/ Deanna R. Rader  
24 Deanna Rader  
25 111 W. Monroe Street  
26 Suite 1600  
27 Floor 16  
28 Phoenix, AZ 85003

Attorneys for Defendant  
**Surety Bail Specialists General  
Agency, LLC**

IT IS SO ORDERED this 1<sup>st</sup> day of April, 2015.

  
UNITED STATES MAGISTRATE JUDGE,

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of Gordon & Rees LLP and that on this 31<sup>st</sup> day of March, 2015, I caused the above and foregoing document entitled Defendant's Motion for Extension of Time to File a Responsive Pleading to be served by:

\_\_\_\_\_ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Phoenix, Arizona; and/or

\_\_\_\_\_ to be served via facsimile; and/or

X through CM/ECF and the court's electronic filing system; and/or

\_\_\_\_\_ to be hand-delivered;

To the attorneys/parties listed below at the address and/or facsimile number indicated below:

Kristina S. Holman  
703 S. Eighth Street  
Las Vegas, NV 89101  
Attorney for Plaintiff  
[kholmanlaw@gmail.com](mailto:kholmanlaw@gmail.com)

/s/ Lisa Young  
An employee of Gordon & Rees LLP

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